

**County of Los Angeles Probation Department
CSA Response
2009 Nutritional Health Inspection Corrective Action Matrix Final
Juvenile Halls and Camps**

#	ARTICLE SECTION	DEFICIENCY	CORRECTIVE ACTION PLAN	CORRECTIONS STATUS	CORRECTED DATE	Updates/Notes
1	1460 Frequency of Serving Food is served to minors on medical diets as prescribed by the attending physician	Physicians often prescribed medical diets (i.e. no dairy, double portion, low carbohydrate and high protein diet, high calcium and iron diet) that kitchen can not provide, (since there is no direction/recipes for kitchen staff to follow).	The Department will hire a Registered Dietitian (RD) to begin working on June 1, 2010. The RD will prepare a Medical Diet Manual that contains all Medical Diets available to order and specific directions and recipes for kitchen staff to follow.	An RD was hired and began work as a full-time permanent employee on June 1, 2010. The RD has prepared a Medical Diet Manual which includes directions and recipes for kitchen staff to follow for each medical diet available to be ordered. The Medical Diet Manual has been forwarded to the Medical Director for Approval. The Medical Diet Manual has been updated to reflect the updated menus. The updated Medical Diet Manual has been approved by the Medical Director.	Hired RD -Completed 06/01/10 Medical Diet Manual -Completed 0716/10 Medical Diet Manual Approved by Physician -Completed 08/30/10 Updated Medical Diet Manual -Completed 01/07/11. Updated Medical Diet Manual is Approved by the Medical Director -Completed 02/09/11.	With the reviewed and approved Medical Diet Manual in place, Probation is currently monitoring medical diets on a daily basis to ensure all medical diets prescribed by the physicians are able to be properly prepared by the kitchen. To accomplish this the following is being done: 1. Each hall forwards their medical diet list to the Probation Food Services Consultant, RD each day. The RD reviews the diet list to ensure each diet prescribed is on the approved diet list. If any diet is not on the approved list, the RD will contact the kitchen to provide them with written instructions until the diet can be resolved. 2. The RD works with the physicians to determine if the diet ordered is appropriate and if one on the approved list can be used. If so, the medical diet list is updated to reflect the new diet and the kitchen is instructed accordingly. Otherwise the RD writes the new diet menus and guidelines and provides instructions to food services staff. The new diet is added to the medical diet manual. 3. The kitchen calls the RD whenever they have questions or need instructions related to any diet whether it is a diet already in the medical diet manual or a new diet. 4. The Probation RD is available to the physicians for consultation and discussion around appropriate diets for minors.
2	1461 Minimum Diet The minimum diet that is provided in the facility is based on the nutritional and caloric requirements found in the 1999-2002 Dietary Nutrition Academies; the 2005 California Daily Food Guide; and, the 2000 Dietary Guidelines for Americans	Unable to determine. The nutritional information of food provided to minors was not submitted for review as requested (verbal, written, and including Office Hearing Procedure) to this Department for evaluation.	The Department will hire an RD to begin working on June 1, 2010 to revise the 5-week cycle menu. The RD will conduct a nutritional analysis of the 5-week cycle menu. The nutrition analysis will confirm that the menus meet the minimum diet standards based on the nutritional and caloric requirements found in the 1999-2002 Dietary Nutrition Academies; the 2005 California Daily Food Guide; and , the 2000 Dietary Guidelines for Americans. The 5-Week cycle menu with nutritional analysis will be forwarded to the County Public Health Inspector for review.	The Department has hired an RD (Food Services Consultant) who began work on June 1, 2010. The RD revised the 5-week cycle menus to meet all nutritional and caloric requirements. A nutritional analysis of the 5-week cycle menu has been completed. The nutritional analysis confirms the menus meet the minimum diet standards as required by the National Nutrition Programs and Title 15. The 5-Week cycle menu with nutritional analysis has been forwarded to County Public Health Inspector for review. The 5-week cycle menu was revised to reflect the contracted menu and decrease costs. A nutritional analysis of the updated 5-week cycle menu has been completed. The nutritional analysis confirms the revised menus meet the minimum diet standards as required by the National Nutrition Programs and Title 15.	Ensure 5-Week Cycle Menus Meet Nutritional and Caloric Requirements -Completed 07/09/10. The contracted 5-week cycle menus were updated and nutritional analysis was conducted. -Completed October 18, 2010. The updated 5-week cycle menus with analysis was forwarded to Phil Dao and Toni Gardner. -Completed October 26, 2010.	The current menus meet Title 15 requirements. The Probation Food Services Consultant has worked very closely with the Contractor to ensure food items and recipes used in each facility would maintain the nutritional integrity of the 5-week cycle menus. The Contractor has hired a seasoned RD to oversee all aspects of food services in the halls. The Morrison RD works closely with the Probation RD to ensure compliance with nutrition regulations. The Public Health Inspector has reviewed the Probation 5-week cycle menus and nutritional analysis and has not indicated any concerns related to the menus or the related nutritional analysis. The Public Health Inspector has reviewed the related Probation recipe book and has not indicated any concerns related to the recipes that would affect the nutritional status of the menus.

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3	1461 Minimum Diet The average daily calorie allowance for female minors between 11-18 years of age is 2200 calories and for males in that age category, 2500-3000 calories each day +/- 20%.	Unable to determine. The nutritional information of food provided to minors was not submitted for review as requested (verbal, written, and including Office Hearing Procedure) to this Department for evaluation.	The Department will hire an RD to determine the daily calorie allowance for its population. The Probation Department RD will conduct a nutrition analysis on the 5-week cycle menus to determine daily their caloric value. The 5-week cycle menus with nutritional analysis indicating the daily caloric value will be submitted to the Public Health Department for review.	The Probation Department Food Services Consultant, RD has set the daily calorie range at 2600 to 3000 kcals per day for its population. An analysis of the 5-week cycle menu confirms the daily calories for all menus are within the established range.	Ensure 5-Week Cycle Menus Meet Caloric Requirements - Completed July 9, 2010	The nutritional analysis conducted on the 5-week cycle menus confirms the menus are within the caloric range set by the Probation RD and therefore meet Title 15 standards.
				The 5-week cycle menu and nutrition analysis has been submitted to the Public Health Department for review. The 5-week cycle menu had to be updated to reflect the contracted menu and decrease costs. A nutritional analysis of the updated 5-week cycle menu has been completed. The nutritional analysis reveals the updated menus meet the minimum diet standards as required by the National Nutrition Programs and Title 15.	The nutrition analysis conducted on the updated 5-week cycle menus confirm that the menus meet caloric requirements. - Completed October 18, 2010.	
4	1461 Minimum Diet Total dietary fat does not exceed 30% of total calories on a weekly basis	Unable to determine.	The Probation Department RD will conduct a nutritional analysis of the newly revised 5-week cycle menu to confirm dietary fat does not exceed 30% of the total calories on a weekly basis. The 5-week cycle menus with nutritional analysis indicating total fat does not exceed 30% of total calories on a weekly basis will be submitted to the Public Health Department for review.	The RD has conducted a nutritional analysis of the 5-week cycle menu. The nutritional analysis confirms that fat on the revised 5-week cycle menus does not exceed 30% of the total calories on a weekly basis.	Ensure 5-Week Cycle Menus do not exceed 30% Fat. - Completed July 9, 2010	The nutritional analysis conducted on the 5-week cycle menus confirms the percent of calories from fat does not exceed 30% and therefore meets Title 15 standards.
				The 5-week cycle menu was revised to reflect the contracted menu and decrease costs. A nutritional analysis of the updated 5-week cycle menu has been completed. The nutritional analysis confirms fat on the revised menus does not exceed 30% of the total calories on a weekly basis.	The nutrition analysis conducted on the revised 5-week cycle menus confirms that the menus do not exceed 30% fat on a weekly basis. - Completed October 18, 2010.	

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5	1462 Medical Diets	No registered dietitian for consultation.	The Probation Department will hire a full-time Registered Dietitian on staff to begin working on June 1, 2010 to plan and develop medical diets. The RD will provide consultation to food service staff to ensure that medical diets are appropriately prepared and served.	The Probation Department has hired a full-time RD who began work on June 1, 2010.	Hired RD -Completed June 1, 2010	The Probation RD plans all medical diets and monitors how medical diets are prepared and served to minors to ensure compliance with Title 15 regulations.
	Medical diets that are utilized by a facility are planned, prepared and served in consultation with a registered dietitian			The RD has planned all medical diets available to be ordered. The RD is available to food service staff for consultation on preparing and serving medical diets.		

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6	1462 Medical Diets The facility manager provides any medical diet prescribed for a minor	No registered dietitian for the facility manager to consult in providing any medical diet prescribed for a minor.	The Department will hire a Registered Dietitian to begin working on June 1, 2010 who will be available for medical diet consultations.	The Probation Department has hired a full-time Registered Dietitian who began work on June 1, 2010. Facility Managers can contact the RD for consultation regarding medical diets prescribed to minors as needed.	Hired RD - Completed June 1, 2010	The Probation RD ensures the medical diets prescribed by physicians can be provided by the kitchen by ensuring the Food Services Manager has menus and/or instructions for preparing the medical diets prescribed by the physician.
7	1462 Medical Diets There is a medical diet manual that includes sample menus. It is available in the medical and food service offices	No medical diet manual that includes sample menus at medical service office.	The Department will hire a Registered Dietitian to begin work on June 1, 2010 to develop a Medical Diet Manual that includes sample menus. The medical diet manual will be reviewed by the RD and approved by the Medical Director. The Medical Diet Manual will be available in the Medical Unit and Food Service offices at each facility.	The Probation Department has hired a full-time RD who began work on June 1, 2010. The RD has developed and reviewed a medical diet manual that includes sample menus. The medical diet manual has been approved by the medical director. The Medical Diet Manual has been updated to reflect the updated menus. The update medical diet manual includes sample menus. The Medical Diet Manual with sample and actual menus is located in the Food Services and Medical offices.	A medical diet manual that includes sample menus has been developed. - Completed July 16, 2010. A updated medical diet manual that includes sample and actual menus has been developed. - Completed January 7, 2011. The Medical Diet Manual is in the Food Services office. Completed Guidelines March 4, 2011. With Menus May 1, 2011. Medical Diet Manual is in the Medical Services office. - Completed May 4, 2011.	All medical and food services units have a current medical diet manual that includes actual and sample menus. As new medical diets are written by the Probation RD, they are forwarded to both Medical and Food Services. The Medical and Food Services units update their medical diet manuals by adding any new diet information provided to them by the RD to their manuals. The Probation Food Services Consultant ensures updated medical diet manuals are on hand and clearly in use during ongoing audits.
8	1462 Medical Diets A registered dietitian reviews, and the responsible physician approves, the diet manual on an annual basis	No registered Dietitian on staff for review.	The Department will hire a Registered Dietitian to begin work on June 1, 2010. The RD will prepare and review a Medical Diet Manual. The medical director will be requested to approve the manual. The registered dietitian will review and the medical director will approve the medical diet manual on a annual basis	The Probation Department has hired a full-time RD who began work on June 1, 2010. The RD has prepared and reviewed the Medical Diet Manual. The medical diet manual has been approved by the medical director.	The RD Reviewed Medical Diet Manual. - Completed July 16, 2010 Revised Medical Diet Manual - Completed January 7, 2011 The Medical Director approved the Medical Diet Manual. - Completed August 29, 2010. Revised Medical Diet Manual - Completed February 2, 2011.	The Medical Diet Manual has been reviewed by the Probation RD, a Health Services RD and the Contractor's RD. The Medical Diet Manual has been approved by the Medical Director. The Probation RD and Medical Director work together to update and add medical diet manuals and to communicate information and instructions to the Physicians regarding medical diets.

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9	1463 Menus Menus are planned at least one month in advance of their use. Menus provide a variety of foods considering the cultural and ethnic makeup of the facility thus preventing repetitive meals	There were instances minors protested too much ham on the menu (particularly weeks 4 & 5 of the menu cycle).	<p>The Probation Department RD will plan all menus at least one month in advance of their use.</p> <p>The RD will create a 5-week cycle menu that will ensure a wide variety of foods are served considering the cultural and ethnic make-up of the facility. Repetitive meals will be avoided.</p> <p>Where there is an instance of a high frequency of any particular food item's), the item's) will be replaced with a different but comparable food component that provides more variety.</p>	<p>The Probation Department RD has planned and developed a revised 5-week cycle menu which will be implemented in September 2010 providing for at least two months advanced planning.</p> <p>The RD has planned and developed the 5-week cycle menus to ensure a variety of foods and consideration of the ethnic and cultural makeup of the population and avoids repetitive meals.</p> <p>Where Ham or other items had appeared on the menu too frequently, the item has been replaced with an alternative.</p>	Menus Developed to Ensure Variety -Completed July 9, 2010	<p>Menus are planned at least one month in advance of their use.</p> <p>Menus provide for variety in consideration of the cultural and ethnic make up of the facility's population.</p> <p>Though Probation has been unable to rework the menus to make many of the changes desired due to contractual constraints, the Probation dietitian has been able to work with the Contractor to change some items while ensuring no cost related issues and thus improve variety and decrease the amount of ham on the menu.</p> <p>Updates will continue to be made as long as both Probation and the Contractor agree on the changes and the changes do not lead to a cost increase.</p> <p>The menus will be completely revised during the current RFP process in preparation for a new food contract.</p>
				Updated menus are planned to provide as much variety as possible while avoiding deviation too far from the menus contained within the contract between the County and the food services contractor.	Updated menus provide adequate variety. -Completed October 18, 2010.	
10	1463 Menus A registered dietitian approves menus before they are used	No Registered Dietician on staff to approve menus before they are used.	<p>The Probation Department will hire a full-time Registered Dietitian to begin working on June 1, 2010.</p> <p>The Probation Department RD will approve all menus before they are used.</p>	<p>The Probation Department has hired a full-time Registered Dietitian who began working on June 1, 2010.</p> <p>The Registered Dietitian has approved the revised 5-week cycle menus.</p> <p>The revised and approved 5-week cycle menus are planned to be implemented in September, 2010.</p>	Hired RD to Approve Menus -Completed June 1, 2010	All menus are pre-approved at least one month in advance of use by the Probation RD. A procedure is in place that provides for pre-set, pre-approved holiday, specialty and BBQ meals. Probation staff can order these pre-approved meals by completing the appropriate form and submitting the form to food services at least 2 weeks prior to the date of service..
11	1463 Menus Changes are noted on the menu and/or production worksheet when any meal that is served varies from the planned menu	Changes are not noted on the menu and/or production worksheet.	<p>All changes to the menu made at the site level will be noted on the menu and menu production record.</p> <p>A Management Services Bureau policy and procedure (MSB P/P) will be developed and implemented regarding documenting changes made to the menu.</p> <p>Training will be provided to the Head and Senior Cooks on the new MSB P/P related to documenting menu changes on the</p>	<p>A Management Services Bureau Policy and Procedure is being developed to address this issue.</p> <p>Training for Head and Senior cooks is being</p>	Policy and Procedure Developed -Completed August 18, 2010 Training for Head and Senior cooks -Completed August 26, 2010	<p>All changes or substitutions made to the planned menu must be documented on the Menu and Menu Production Record as per Probation Food Services Policy.</p> <p>The Probation Food Services Consultant audits the sample trays on hand as well as food services documents to confirm changes and/or substitutions are properly indicated.</p>

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			Menu Production Record and Menu.	planned.		Substitutions must be made in accordance with Probation Food Services policy.
			The Probation Department RD will conduct periodic audits to review menu changes and ensure they have been appropriately documented. Findings will be reported to the Probation Director.			

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12	1463 Menus Menus, as planned and including changes, are retained for one year and evaluated by a registered dietitian at least annually	No Registered Dietician to evaluate menus.	<p>The Probation Department will hire a full-time Registered Dietitian to begin working on June 1, 2010.</p> <p>The RD will plan all menus.</p> <p>Menus will be planned, evaluated, and updated by the Probation Department, RD on an annual basis.</p> <p>Menus, as planned and including changes will be retained for at least one year. The MSB will develop a policy regarding the documentation and retention of menus and menu changes which will be provided to all food service staff.</p>	<p>The Probation Department has hired a full-time RD who began working on June 1, 2010.</p> <p>The RD has planned and developed the 5-week cycle menus.</p> <p>The MSB is developing a Policy regarding menu planning and development and a Policy on Menu change documentation.</p>	Hired RD to Evaluate Menus - Completed June 1, 2010	The Probation RD evaluates all menu changes and/or substitutions during the auditing process conducted at least every quarter.
13	1464 Food Services Plan (FSP) There is a written food services plan that complies with the applicable sections of California retail Food Code (Cal Code). In facilities with an average daily population of 50 or more, a trained and experienced food services manager is employed or available to prepare a food services plan. In facilities with an average daily population that is less than 50, that do not have a food services manager, the facility manger prepares the plan. The plan included, but is not limited to the following policies and procedures;	The inspection revealed no trained and experienced food services manager was available at this facility, and food service plan was outdated and incomplete.	<p>A renewed Food Service Plan will be developed through consultation and collaboration with the Probation Department Food Service Consultant, RD and Chief Cook.</p> <p>The new Food Services Plan will include Probation Department Directives and policies and procedures developed by the MSB.</p> <p>All facility food service managers will be trained on the new MSB policies and procedures and provided with a copy of the Food Service Plan which they will be required to keep on hand in their facility for reference.</p>	<p>The Food Service Plan is in the process of being developed by the Probation Department, Food Service Consultant, RD and Chief Cook with administrative support.</p> <p>Related MSB policies are being developed as a part of the process of developing the Food Service Plan.</p> <p>The Food Service Plan is completed in draft form.</p> <p>The MSB is planning for training to be provided to food service staff once the Plan has been completed.</p>	<p>The Food Services Plan was developed and Made Complete -Completed August 10, 2010</p> <p>Related Policies have been written -Completed August 10, 2010</p> <p>Training of Food Services Managers has been conducted. -Completed on: 10/07/10, 11/10/10, and 01/25/11</p> <p>The FSP is approved and signed off. -Completed March 2, 2011</p> <p>The FSP is implemented at the Halls. -Completed at LPJH 3/4/2011 -Completed at BJNJH 3/9/2011 -Completed at CJH 3/9/2011</p>	<p>The Probation Food Services Plan has been prepared to meet the standards contained within Title 15 and the California Food Code.</p> <p>Each Food Services Plan contains policies and procedures specific to the given facility.</p> <p>The Food Services Plan is a living document that is and will be continually revised as each facility changes the way it operates and conducts business. When any policy or procedure contained within the Food Services Plan no longer works for the facility's operations, the Food Services Plan and/or any related Food Services Policy is updated to reflect the change.</p> <p>All updates affecting operational procedures and/or new policies added to the Food Services Plan are submitted for signature of approval.</p> <p>Affected staff are provided with instructions for complying with new procedures.</p>
14	menu planning;	food service plan outdated/incomplete	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for planning menus.
15	purchasing;	food service plan outdated/incomplete	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for purchasing food.
16	storage and inventory control;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for the storage of food and inventory control.
17	food preparation;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for the preparation of food for minors.
18	food serving;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for serving food to minors.

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19	transporting food;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for the transporting food that will be served to minors.

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20	orientation and on-going training;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for orientating new staff and the ongoing training of staff.
21	personnel supervision;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for the supervision of food services personnel.
22	budgets and food costs accounting;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for the budgeting food costs and related accounting.
23	documentation and record keeping;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for documenting food services activities and maintaining related records.
24	emergency feeding plan;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for implementing an emergency feeding process.
25	maintenance and repair;	food service plan outdated/incomplete.	Refer to # 13	Refer to #13	Same as #13 - Food Services Plan	The Probation Food Services Plan includes a plan and related policies for the maintenance and repair of food services equipment and facilities.